



Division of
Underground
Storage Tanks



January 2021

Tennessee Tank Talk



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Welcome!

Welcome to the sixth edition of *Tennessee Tank Talk*. Our continuing purpose is to bring you information about the implementation of the Tennessee Division of Underground Storage Tanks (UST) Rules that became effective October 13, 2018. As always, we encourage your feedback and input so that we can have the most meaningful Rules for all Tennesseans.

Let us know what you think of this newsletter by emailing us at Tanks.UST@tn.gov. Send us your ideas and suggestions to help us continually improve.

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Stan Boyd

Director

TN UST Virtual Tank School

TN Tank School is a training opportunity originally developed for a live classroom setting. TN Tank School is designed to improve tank owners and/or operators knowledge and compliance with the underground storage tank rules, how to maintain regulatory compliance, prepare tank owners and/or operators for future compliance inspections, and provide information about any upcoming new regulatory requirements. The class covers UST systems equipment, operations, testing requirements, record keeping, and other specific requirements. Attendance may be voluntary, or a requirement to address operational compliance violations from an enforcement action. All attendees who complete the entire class receive a Certificate of Attendance. Any attendee who completes the entire class and scores a 70 or higher on the final exam will be given a Certificate of Operator Training which is recognized by the Division for having completed the requirements for a certified Class A and Class B Operator.

In May of 2020, the Division developed an online 'Virtual' TN Tank School opportunity in response to the TN COVID19 mandates limiting in-person classroom instruction. To date, the Division has complete five virtual tank school classes. The virtual class includes:

- A pre-test emailed to the attendee to be completed and submitted prior to the day of class,
- A full-day class presentation by Division inspectors (in-class discussions and questions are encouraged),
- A final post-test, and
- A post-test review and a brief 2018/2021 TN UST New Rules Update presentation is available at the end of the class.

The new virtual Tank School class evaluations and feedback have reflected positive comments and reviews regarding the technology requirements, registration and testing procedures, and the overall class instruction and discussions.

The Division welcomes any opportunity to educate and provide outreach to tank owners and/or operators. Division staff is always available to assist tank owners and operators to obtain and maintain operational compliance. The 2021 schedule for the Virtual TN Tank School class is: February 3, 2021; April 7, 2021; June 2, 2021; August 4, 2021; October 6, 2021; December 1, 2021. The class schedule can also be

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To register for any of these dates please respond to this newsletter email or contact **Nigel Luther** at nigel.luther@tn.gov or **Mitzie Berry** at mitzie.berry@tn.gov.

New Rules Contractor / Vendor Webinars

Register Today!

The Division is hosting a series of webinars beginning January 25, 2020, focused on the TN DUST 2018 / 2021 New Rule compliance topics; IM Sump Testing, Spill / Overfill Testing, Release Detection Equipment Operability Testing, Monthly and Annual Walkthrough Inspections, and Emergency Generator / Dual Use UST Systems. These hour-long webinars will be presented by Division staff for the purpose of reviewing the 2018/2021 TN UST New Rule requirements at a **contractor/vendor** audience level to encourage discussions and clarifications of the new requirements. Also, the Division is encouraging participation and feedback on any issues encountered going forward. The goal is to provide an open forum of communication between inspectors, service providers, tank owners and/or operators, and any other interested parties.

Our schedule (subject to change without notice) is as follows:

- Monday, January 25, 2021 | 10 a.m. ET/ 9 a.m. CT | Sump Integrity Testing | Registration is **Full**
- Monday, February 8, 2021 | 10 a.m. ET/ 9 a.m. CT | Spill / Overfill **Registration OPEN**
- Monday, February 22, 2021 | 10 a.m. ET/ 9 a.m. CT | Release Detection
- Monday, March 8, 2021 | 10 a.m. ET/ 9 a.m. CT | Walkthroughs
- Monday, March 22, 2021 | 10 a.m. ET/ 9 a.m. CT | Generators / Dual Use UST Systems

Please contact Division personnel if you have any difficulties registering or if you would like to register for a future presentation. Be advised, registration is limited for these webinars. These webinars will be recorded and available on the Division's website. Also, the Division is planning to offer this live webinar series again later this year.

Beginning in April 2021 and May 2021, the Division will be offering general 2018/2021 New Rules Overview webinars for tank owners/operators and any other interested parties. Upon request, the Division can provide onsite and/or remote meetings and webinars for tank owners/operators and interested parties.

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2021 TN UST Owners Compliance Toolbox - Update

The Division is pleased to announce the latest version of the Toolbox has been mailed to all registered tank owners. The mailer version is available upon request, and the Toolbox can also be downloaded from the following link:

<https://www.tn.gov/environment/program-areas/ust-underground-storage-tanks/ust/operator-training/educational-tools.html>

The Toolbox is an annual Division outreach effort to assist tank owners and/or operators in Tennessee to achieve and maintain compliance with the Division's operational regulatory requirements. The Toolbox provides all the needed forms, guidance and best practices documents as of October 2020. Since new rules are being adopted and some sources of information are outside of the Division, the most up to date information will always be our website. To help you stay as current as possible for research and compatibility issues, the Toolbox contains links to outside entities such as the EPA and PEI; who provide and maintain their respective information and intellectual property. Please understand that the Toolbox is being provided as supplemental information and should not be used as or interpreted to be a substitute for required Operator Training. The Division provides a TN Tank Owner Compliance Toolbox annually to all registered owners of regulated USTs in Tennessee. The Toolbox is also available to any owners, operators and interested parties upon request or by using the link highlighted above.

If you need assistance with the Toolbox, please respond to this newsletter email address or contact your local [Environmental Field Office](#).

New 2018/ 2021 Rule Change Monthly Walkthrough Inspections

Monthly Walkthroughs - Operations and Maintenance Requirements and Recordkeeping

New Rule Requirement: Periodic (Monthly) operation and maintenance walkthrough inspections.

Tank Owner Responsibility: Every 30 days a walkthrough inspection must include:

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Spill Prevention Equipment:

- Visually check for damage,
- Remove liquid or debris,
- Check for and remove obstructions in the fill pipe,
- Check the fill cap to make sure it is securely on the fill pipe, and
- Double-walled spill prevention equipment with interstitial monitoring, check for a leak in the interstitial area.

Release Detection Equipment

- Check to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present, and
- Ensure records of release detection testing are reviewed and current.

Monthly walkthrough inspection records shall be maintained for **twelve** months. These records must include a list of each area checked, whether each area checked was acceptable or needed action taken, a description of actions taken to correct an issue. The monthly walkthrough inspections must be documented on a form approved by the Division.



Q&A

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How often is a fill port cap required to be inspected?

make sure they are securely on the fill pipe every thirty days.

For release detection equipment, what must be checked monthly?

Release detection equipment must be checked monthly to make sure the release detection equipment is operating with no alarms or other unusual operating conditions present, and ensure records of release detection testing are reviewed and current.

How often must the spill prevention equipment be inspected?

Spill prevention equipment must be inspected every thirty days.

How long must the monthly walkthrough inspection records be maintained?

The monthly walkthrough inspection records must be maintained for twelve months.

What items must the monthly walkthrough records include?

The monthly walkthrough records must include a list of each area checked, whether each area checked was acceptable or needed action taken, and a description of actions taken to correct an issue.

What is checked on double walled spill prevention

During a monthly walkthrough inspection, double-walled spill prevention equipment

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monthly walkthrough
inspection?

with interstitial monitoring must check for a
leak in the interstitial area.

Helpful Resources

[UST- New Rules Web Page](#)

[Contact Your Local Field Office](#)

[2018 Federal Rule Change Quick Reference Guide](#)

[Current Tennessee UST Rules](#)

[EPA -Must For USTs](#)

[TDEC Underground Storage Tanks Home Page](#)

[EPA- Underground Storage Tanks Home Page](#)



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